

Exhibit B

Martin Declaration

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

The Hertz Corporation, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-11218 (MFW)

(Jointly Administered)

**DECLARATION OF BRIAN MARTIN IN SUPPORT OF DEBTORS’
TWELFTH OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO
CERTAIN INSUFFICIENT DOCUMENTATION CLAIMS**

I, Brian Martin, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge, information, and belief:

1. I am a managing director at FTI Consulting, Inc. (“**FTI**”). On June 24, 2020, the Court approved FTI’s retention as restructuring advisor to The Hertz Corporation and its debtor affiliates in the above-captioned chapter 11 cases (collectively, the “**Debtors**”) *nunc pro tunc* to May 22, 2020.

2. I submit this declaration (the “**Declaration**”) in support of the *Debtors’ Twelfth Omnibus (Non-Substantive) Objection to Certain Insufficient Documentation Claims* (the “**Objection**”),² dated as of the date hereof and filed contemporaneously herewith.

¹ The last four digits of The Hertz Corporation’s tax identification number are 8568. The location of the Debtors’ service address is 8501 Williams Road, Estero, FL 33928. Due to the large number of debtors in these chapter 11 cases, which are jointly administered for procedural purposes, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://restructuring.primeclerk.com/hertz>.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Objection.

3. I am over the age of eighteen and am authorized by the Debtors to submit this Declaration. All statements in this Declaration are based upon my personal knowledge, my review (or the review of others under my supervision) of (a) the relevant proofs of claim, (b) the official register of claims filed in the Chapter 11 Cases, and/or (c) the Debtors' books and records and other documents identified herein. If called as a witness, I could and would competently testify to the facts set forth in this Declaration.

4. The proofs of claim subject to the Objection were carefully reviewed and analyzed in good faith using due diligence by appropriate personnel of the Debtors, FTI, Prime Clerk, ESIS, Inc., White & Case LLP, and Richards, Layton & Finger, P.A.

5. Each Insufficient Documentation Claim listed on **Schedule 1** to the Proposed Order was filed without sufficient documentation to substantiate the claims asserted therein. The Debtors have been unable to locate any documentation that would substantiate the Insufficient Documentation Claims, whether in full or in part.

6. The basis for the Debtors' determination includes, but is not limited to, the Debtors' and their professionals' review of (a) the Debtors' books and records, which are maintained in the ordinary course of business by the Debtors, which do not reflect the existence of the asserted Insufficient Documentation Claims, (b) the claims database maintained in the ordinary course by ESIS, Inc., the Debtors' third-party claims administrator, which also does not reflect the existence of the asserted Insufficient Documentation Claims, (c) searches run on (i) LexisNexis CourtLink, (ii) Bloomberg Law and (iii) Courthouse News Service to determine whether there is pending litigation filed by the claimant against the Debtors, of which none was found, and (d) the proofs of claims asserting the Insufficient Documentation Claims, which provide no basis or appropriate supporting documentation on which the Debtors can determine that a valid claim exists. Therefore,

the Debtors (i) object to the allowance of the Insufficient Documentation Claims set forth on **Schedule 1** to the Proposed Order and (ii) seek entry of the Proposed Order disallowing and expunging the Insufficient Documentation Claims.

7. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Date: March 17, 2021

/s/ *Brian Martin*

Brian Martin

Managing Director, FTI Consulting, Inc.